



July 27, 2016

Benedict P. Morelli

**VIA E-FILE**

Magistrate Judge Marilyn D. Go  
United States District Court  
225 Cadman Plaza East  
Room 1214-S  
Brooklyn, NY 11201

**RE: Eugenie Bouchard v. United States Tennis Association, Inc. and  
USTA National Tennis Center, Inc., Civ. Case No. 1:15-cv-5920-  
AMD-MDG**

Dear Judge Go:

We represent Plaintiff Eugenie Bouchard in the above-captioned matter.

As per your instructions, we have met, conferred and mediated in good faith with the Defendants. The parties have completed considerable written discovery and worked together cooperatively thus far throughout the discovery process.

However, at this time, Plaintiff respectfully requests a ninety-day extension of all remaining fact (and related) discovery deadlines. The Defendants consent to an extension of these discovery deadlines and the proposed schedule below. The reason for this request is that Ms. Bouchard's rigorous worldwide professional tennis schedule has made it incredibly difficult, if not impossible, to schedule her for necessary fact discovery appearances. Her tennis season ends in mid/late October, and she will be fully available at that time.

The original discovery fact discovery deadline is September 30, 2016. There have been no previous requests for an adjournment. As this requested extension affects other previously ordered discovery deadlines, including the dates by which the parties must make expert disclosures, a proposed revised discovery schedule is as follows:

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(1) fact discovery to be completed by 12/30/16; (2) medical expert reports and disclosures served by plaintiff by 11/30/2016 and by defendants by 12/30/2016; non-medical expert report(s) and disclosures served by plaintiff by 01/31/17 and by defendants by 02/28/17; expert discovery completed by April 16, 2017.

Thank you for your consideration.

Respectfully Submitted,

/s/ Benedict Morelli

Benedict P. Morelli

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